

## United States District Court

SOUTHERN

DISTRICT OF  
MCALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Christoval Guerra

A206 886 432

YOB: 1990

Principal

United States

United States District Court  
Southern District of Texas  
FILED  
Case Number:  
15-0038-M

Valeria Hinojosa

A206 886 431

YOB: 1993

Co-Principal

United States

JAN 15 2015

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 13, 2015 in Starr County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Miguel Angel Dominguez-Gonzalez, citizen and national of the United Mexican States, along with three (3) other undocumented aliens, for a total of four (4), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location in Roma, Texas to the point of arrest in Roma, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY  
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On January 13, 2015, Rio Grande City agents were conducting surveillance operations in the Roma, Texas, when agents observed a blue Jeep Liberty approach the intersection of Estrella Street and Zaragoza Street. Immediately after the stopping at the intersection, agents observed four subjects run to the blue Jeep and board the vehicle. Mobile units were relayed a description and its direction of travel for the vehicle. Mobile units were able to stop said vehicle at the Jack in the Box. As the vehicle drove into the Jack in the Box restaurant parking lot and while the vehicle was still in motion two subjects jumped out of the Jeep and attempted to abscond. After a short foot pursuit, agents were able to apprehend the two subjects. The other two subjects ran into the Jack in the Box where agents were able to apprehend them.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

approved by  
AV 87 Kuto/R

Sworn to before me and subscribed in my presence,

January 15, 2015  
Date

Dorina Ramos, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Complainant

Jeremiah J. Abrego Senior Patrol Agent  
Printed Name of Complainant

at McAllen, Texas  
City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-15-0038-M**

**RE: Christoval Guerra  
Valeria Hinojosa**

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**CONTINUATION:**

The driver and passenger were identified as Christoval Guerra and Valeria HINOJOSA; both were questioned to their citizenship status, and both claimed to be United States Citizens. Agents ordered GUERRA to turn off the vehicle and place the keys on the roof of the truck. GUERRA failed to comply, so agents proceeded to remove the keys from the vehicle's ignition and placed them on the roof of the car. The four passengers were questioned to their immigration status, all four subjects freely and willingly admitted to being illegally in the United States with no documentation to be or remain in the United States. All subjects were transported to the Rio Grande City, Texas Border Patrol Station for processing.

**PRINCIPAL STATEMENTS:**

At the Border Patrol Station, both principals were advised of the rights by Agents and advised he understood their rights and agreed to provide statements without the presence of a lawyer. GUERRA, Christoval, stated that he was in Roma on this date to pick up illegal aliens and transport them to Escobares, Texas. GUERRA stated that he was aware that the subjects were illegal and was to be paid \$120 dollars to take them to Escobares, Texas. GUERRA also stated that he was called by a subject known as "El Parejon" and was to pick up the four subjects in an area known as "La Nopalera". GUERRA also stated that he approached the area and honked so that the illegals could know which vehicle they were going to get into. He further stated, that once the illegal aliens were inside of the Jeep that he didn't tell them anything until the Border Patrol units behind them. GUERRA also stated that he did not bring the vehicle to a stop before the subjects began to jump out of the Jeep.

**PRINCIPAL STATEMENT 2:**

HINOJOSA, Valeria stated that she was in Roma, Texas with her boyfriend (GUERRA) and that he had asked her to accompany him to run some errands. HINOJOSA also stated they stopped at a location called "La Nopalera" and picked up four subjects. She stated that when they had arrived at the pick-up location, GUERRA honked, then she opened the door to yell at the group to get in. HINOJOSA further stated that her boyfriend has picked up several times before but that she was not sure how many. After picking-up the aliens, she stated that GUERRA quacking drove off speeding through city streets. After Border Patrol units drove up behind them she instructed the four illegals to get down. HINOJOSA stated that GUERRA was to be paid \$130 per person but that since the vehicle was hers she was going to try to take most if not all of the money. She stated that she knew that the people that they were picking up were illegal aliens.

**UNITED STATES DISTRICT COURT  
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**CONTINUATION:**

**Material Witness Statement:**

DOMINGUEZ-Gonzalez, Miguel Angel, a citizen Mexico was advised of his rights in the Spanish language by Agents and stated that he understood his rights and was willing to answer all questions without the presents of a lawyer.

DOMINGUEZ-Gonzalez was charged \$3,600.00 USD to be smuggling illegally into the United States and crossed the Rio Grande River with four others and a foot guide who instructed them to go north to an old house at a stop sign and wait there and someone would come for them. He stated that a blue car arrived and honked for them to come out. He stated when they came out of the house female passenger lowered her window and gave them a hand sign to get in the vehicle. The subject stated that when he entered the vehicle he noticed the driver was a chubby male wearing a camouflage shirt. DOMINGUEZ-Gonzalez stated that shortly after they got in the vehicle and left, a Border Patrol unit got behind them. He stated that when the driver and the passenger realized that the Border Patrol was behind them the female passenger told the driver to turn. He explained that they turned into a store and the female passenger yelled for them to get out. DOMINGUEZ-Gonzalez and another subject of the group got out of the vehicle while it was still moving and began to run away from the vehicle. DOMINGUEZ-Gonzalez, Miguel Angel was able to positively identify GUERRA, Christoval and HINOJOSA, Valeria through photo line-up as the driver and passenger of the blue vehicle.

**NOTE:**

In September of 2014, GUERRA was a principal in a 1 on 0 Administrative Alien Smuggling case and in July of 2007 was convicted of narcotics smuggling.